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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR-12-0459 EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME
)	UNDER THE SPEEDY TRIAL ACT
)	
v.)	
)	
)	
ANDREA C. MOHR,)	
)	
Defendant.)	
)	

WHEREAS, the above-captioned matter came before the Court on March 20, 2013, for status conference. The United States was represented by AUSA Tom Stevens, and defendant Mohr, who was present, was represented by Marc Axelbaum. The Court set the case for a further status conference on April 24, 2013, and for jury trial on May 31, 2013.

WHEREAS, during the previous status conference on February 27, 2013, the Court excluded time under the Speedy Trial Act (18 U.S.C. § 3161) from that date through and including March 20, 2013, for continuity of counsel and counsel's effective preparation.

WHEREAS, counsel for the United States and for Mohr requested the continuance to the

1 April 24 date, after noting that Mohr had requested, and the government agreed to produce,
2 additional discovery.

3 NOW THEREFOR, based upon the need for Mohr's counsel effectively to prepare in
4 connection with the additional discovery, the parties seek a further exclusion of time under the
5 Speedy Trial Act, through and including April 24, 2013.

6 SO STIPULATED.

7 DATED: March 22, 2013

MELINDA HAAG
United States Attorney

8
9 _____/s
10 Thomas E. Stevens
Assistant United States Attorney

11 DATED: March 22, 2013

12 _____/s
13 Marc Axelbaum
Counsel to Andrea Mohr

14 **[PROPOSED] ORDER**

15 Based upon the above stipulation, the Court finds that the time from and including March
16 20, 2013, to and including April 24, 2013, should be excluded under the Speedy Trial Act, 18
17 U.S.C. § 3161(h)(7)(A), because the ends of justice served by the continuance outweigh the best
18 interest of the public and defendant in a speedy trial. The findings are based upon the need for
19 the defendant to have reasonable time necessary for effective preparation pursuant to 18 U.S.C. §
20 3161(h)(7)(B)(iv), taking into account the exercise of due diligence.

21 IT IS SO ORDERED.

22 DATED: March 25, 2013
23

